

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:

BSPV-PLANO, LLC,¹

Debtor.

Chapter 11

Case No. 22-40276 (BTR)

**NOTICE OF APPEARANCE AND REQUEST
FOR SERVICE OF NOTICES AND PLEADINGS**

PLEASE TAKE NOTICE THAT the undersigned hereby appears as counsel for The Huntington National Bank, trustee (the “**Trustee**”), in the above-referenced bankruptcy case. Such counsel hereby enters their appearance under § 1109(b) of the United States Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and such counsel hereby requests, under Bankruptcy Rules 2002, 3017 and 9007 and §§ 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon them at the following:

Judith W. Ross
State Bar No. 21010670
ROSS & SMITH, P.C.
700 North Pearl, Suite 11610
Dallas, TX 75201
Telephone: 214-377-7879
Facsimile: 214-377-9409
Email: judith.ross@judithwross.com

PLEASE TAKE FURTHER NOTICE THAT, under § 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted

¹ The last four digits of the Debtor’s federal tax identification number is (3228). The Debtor’s address for notices is: 4851 Keller Springs Road 209, Addison, Texas 75001.

or conveyed by mail, hand delivery, telephone, telecopy, email, or otherwise filed or made with regard to the referenced cases and proceedings herein with respect to (1) that affects or seeks to affect in any way, any rights or interests of any creditor or party of interest in this case, with respect to: a) the debtor; b) property of the estate, or proceeds thereof in which the alleged debtor may claim an interest; or c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment, or other conduct by Trustee.

PLEASE TAKE FURTHER NOTICE THAT, neither this Notice of Appearance nor any former or later appearance, pleading, claim or suit will waive (1) Trustee's right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) Trustee's right to trial by jury in any proceeding in these cases or any case, controversy, or proceeding related to these cases, (3) Trustee's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims, action, defenses, including defenses to jurisdiction, setoffs, or recoupment's to which Trustee may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Trustee expressly reserves.

Dated: March 5, 2022

By: /s/ Judith W. Ross

Judith W. Ross

State Bar No. 21010670

Frances A. Smith

State Bar No. 24033084

Eric Soderlund

State Bar No. 24037525

Jessica Lewis

State Bar No. 24060956

ROSS & SMITH, PC

700 N. Pearl Street, Suite 1610

Dallas, Texas 75201

Telephone: 214-377-7879

Facsimile: 214-377-9409

Email: Judith.riss@judithwross.com

frances.smith@judithwross.com

eric.soderlund@judithwross.com

jessica.lewis@judithwross.com

*Co-Counsel for The Huntington National Bank, as
Trustee*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of March 2022, I caused to be served a true and correct copy of the above and foregoing document via the Court's ECF filing system and/or U.S. mail as indicated in the attached Master Service List.

/s/ Judith W. Ross

Judith W. Ross

Master Service List
BSPV-Plano, LLC
Case No. 22-40276

Debtor:

BSPV-Plano, LLC
4851 Keller Springs Rd., #209
Addison, TX 75001
Served via U.S. mail

Debtor's Counsel:

Munsch Hardt Kopf & Harr
Attn: Thomas Daniel Berghman
Davor Rukavina
500 N. Akard, Ste. 3800
Dallas, TX 75201-6659
Phone: 214-855-7554
Fax: 214-978-4346
Email: tberghman@munsch.com
drukavina@munsch.com
Served via ECF

Munsch Hardt Kopf and Harr PC
Attn: Thanh Nguyen
Jay H. Ong
1717 West 6th Street, Suite 250
Austin, TX 78703
Phone: 512-391-6100
Fax: 512-391-6149
Email: anguyen@munsch.com
jong@munsch.com
Served via ECF

U.S. Trustee:

Office of the U.S. Trustee
110 N. College Ave., Suite 300
Tyler, TX 75702
Phone: 903-590-1450
Email: ustpreion06.ty.ecf@usdoj.gov
Served via ECF

20 Largest Creditors:

AGES Service Company, Inc.
1080 S. Kimball Ave., Ste. 150
Southlake, TX 76092
Served via U.S. mail

American Arbitration Association
120 Broadway, 21st Fl.
New York, NY 10271
Served via U.S. mail

Centex Skilled Trades, LLC
1813 Ann and Dossy Ct.
Crowley, TX 76036
Served via U.S. mail

Civil Point Engineers
9101 LBJ Frwy., Ste. 300
Dallas, TX 75243
Served via U.S. mail

Dalworth Framing Corp.
4817 Worth St.
Dallas, TX 75246
Served via U.S. mail

JM Lawncare & Sprinkler, LLC
806 Jennifer Ct.
Highland Village, TX 75077
Served via U.S. mail

Landstar Excavation Inc.
P. O. Box 293838
Lewisville, TX 76247
Served via U.S. mail

Miguel Hernandez
1508 Indiana Ct.
Irving, TX 75060
Served via U.S. mail

Oldham Lumber Company
8738 Forney Rd.
Dallas, TX 75227
Served via U.S. mail

Paradis Brothers Construction Inc.
450 Cherry Ln.
Southlake, TX 75092
Served via U.S. mail

TXU Energy
P. O. Box 650638
Dallas, TX 75265-0638
Served via U.S. mail

Ranger Fire, Inc.
1000 S. Main St., Ste. 150
Grapevine, TX 76051
Served via U.S. mail

Zais Companies
P. O. Box 1403
Decatur, TX 76234
Served via U.S. mail

Regent Construction
1107 E 1st St.
Fort Worth, TX 76102
Served via U.S. mail

Republic Services #615
551 Huffines Blvd.
Lewisville, TX 75056
Served via U.S. mail

Slates Harwell LLP
1700 Pacific Ave., Ste. 3800
Dallas, TX 75201
Served via U.S. mail

Southwest Enclosure Systems, Inc.
1438 Crescent Dr., #104
Carrollton, TX 75006
Served via U.S. mail

Terry's Portable Welding
106 E. Pioneer
Irving, TX 75061
Served via U.S. mail

Trinia Zais
P. O. Box 1403
Decatur, TX 76234
Served via U.S. mail

Trusted Mechanical Services
7665 Dick Price Rd.
Mansfield, TX 76063
Served via U.S. mail